

1 JONATHAN D. BLUM, Esq.  
2 Nevada Bar No. 9515  
**WILEY PETERSEN**  
3 1050 Indigo Drive, Suite 200B  
4 Las Vegas, Nevada 89145  
Telephone: 702.910.3329  
Facsimile: 702.553.3467  
jblum@wileypetersenlaw.com

5  
6 KENNETH J. CATANZARITE, Esq.  
California Bar No. 113750  
*Pro Hac Vice Forthcoming*  
7 TIM JAMES O'KEEFE, Esq.  
California Bar No. 290175  
*Pro Hac Vice Forthcoming*  
8  
**CATANZARITE LAW CORPORATION**  
9 2311 West Lincoln Avenue  
Anaheim, California 92801  
10 Telephone No.: (714) 520-5544  
Facsimile No.: (714) 399-0577  
11 kcatanzarite@catanzarite.com

12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 JAMES DUFFY, a.k.a. JIM DUFFY, an  
16 individual;

CASE No.: 2:22-cv-01988-APG-BNW

17 Plaintiff,  
18 vs.  
19 JP MORGAN CHASE BANK, NATIONAL  
ASSOCIATION.

**MOTION TO EXTEND DEADLINE TO  
SUBMIT PETITION FOR PERMISSION  
TO PRACTICE PRO HAC VICE  
PURSUANT TO LR IA 11-2(e)**

20 Defendant.  
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23 Plaintiff JAMES DUFFY, a.k.a. JIM DUFFY ("Plaintiff"), by and through his counsel of record,  
24 Jonathan D. Blum, Esq. of the law firm Wiley Petersen, and Kenneth J. Catanzarite, Esq. and Tim  
25 James O'Keefe, Esq. of the law firm Catanzarite Law Corporation, hereby submit this *Motion to Extend*  
26 *Deadline to Submit Petition for Permission to Practice Pro Hac Vice Pursuant to LR IA 11-2(e)* (the  
27 "Motion").

28 //

1 This Motion is made and based upon the following memorandum of Points and Authorities, the  
2 pleadings and papers on file with the Court, and any oral argument that this Court may entertain.

3 DATED this 13<sup>th</sup> day of December, 2022.

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WILEY PETERSEN

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California Bar No. 113750  
*Pro Hac Vice Forthcoming*  
TIM JAMES O'KEEFE, Esq.  
California Bar No. 290175  
*Pro Hac Vice Forthcoming*  
*Will comply with LR IA 11-2 within 14 days*  
**CATANZARITE LAW CORPORATION**  
2311 West Lincoln Avenue  
Anaheim, California 92801  
Telephone No.: (714) 520-5544  
Facsimile No.: (714) 399-0577  
kcatanzarite@catanzarite.com

*Attorneys for Plaintiff*

## POINTS AND AUTHORITIES

### I. INTRODUCTION

Plaintiff initiated this action on November 29, 2022. The Complaint lists two California-based attorneys that seek admission to represent this Plaintiff in this case pro hac vice, Kenneth Catanzarite and Tim O'Keefe. Both have diligently sought certificates of good standing from each state in which they are admitted to practice law. Unfortunately, not all certificates have been received, despite timely request of all of them. The 14-day period to comply with LR IA 11-2 expires on December 14, 2022. As such, Plaintiff seeks an additional thirty days to complete and file the verified petitions to serve as counsel for Plaintiff in this case.

1           **II. LEGAL ARGUMENT**

2           LR IA 11-2(e) states as follows:

3           An attorney must comply with all provisions of this rule within 14 days of his or her  
4           first appearance. In criminal cases, the defendant(s) must execute designation(s) of  
5           retained counsel bearing the signature of both the attorney appearing pro hac vice and  
6           the associated resident attorney. The designation(s) must be filed and served within the  
7           same 14-day period.

8           Additionally, the form entitled, "Verified Petition For Permission to Practice in this Case Only by  
9           Attorney Not Admitted to the Bar of this Court and Designation of Local Counsel" requires as follows:

10           3. Petitioner shall attach a certificate from the state bar or from the clerk of the supreme  
11           court or highest admitting court of each state, territory, or insular possession of the  
12           United States in which the applicant has been admitted to practice law certifying the  
13           applicant's membership therein is in good standing.

14           As such, all certificates of good standing are required before admission. With regard to Mr. Catanzarite,  
15           he is licensed in the following states: NY, OH, TX, KS and CA. He has received certificates of good  
16           standing from all such states, except KS and CA. With regard to Mr. O'Keefe, he is licensed in United  
17           States District Court for the Western District of Michigan and California, and is still awaiting those  
18           certificates. Due to the holidays, and the delays thus far, it is impossible to predict when the certificates  
19           will be received. Kansas and California only provide certificates via US Mail. As such, Plaintiff  
20           requests an additional 30 days to comply with the rule, which will allow sufficient time to receive the  
21           missing certificates and file the verified petition. There is good cause to extend this deadline, since the  
22           delay is not caused by Plaintiff, but organizations outside of counsel's control. Given that Defendant  
23           has not yet filed a responsive pleading, there will be no prejudice to any party to extend the deadline  
24           as requested.

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1           **III. CONCLUSION**

2           Based upon the foregoing, Plaintiff's Motion should be granted, and a 30-day extension to  
3 comply with LR IA 11-2 should be entered.

4           DATED this 13<sup>th</sup> day of December, 2022.

5           **WILEY PETERSEN**

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27          kcatanzarite@catanzarite.com

28          *Attorneys for Plaintiff*

IT IS SO ORDERED:

Dated: December 14, 2022

  
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24          ANDREW P. GORDON  
25          UNITED STATES DISTRICT JUDGE